## REMARKS

In accordance with the foregoing, claims 1-19 have been cancelled without prejudice or disclaimer and new claims 20-37 have been added. No new matter has been added. Claims 20-37 are pending and under consideration.

## **Non-Prior Art Rejections**

In item 4 on page 2 of the Office Action the Examiner rejected claims 1, 7, 13, and 14 under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicants regard as the invention. Specifically, the Office Action cited the recitation of "a co-occurrence" as difficult to interpret. New claims 20-37 do not recite "a co-occurrence" and instead refer to "a co-occurring relationship" (e.g., claim 20, line 5). The term "co-occurring relationship" is defined in the specification by examples, e.g., in the statement that "[t]hese links mainly represent co-occurring relationship, for instance, the relationship between keywords frequently appearing in a single document, or the relationship between persons frequently attending the same meeting" (page 12, lines 12-15). Therefore, withdrawal of the rejection is respectfully requested.

## **Prior Art Rejections**

In item 6 on pages 3-6 of the Office Action the Examiner rejected claims 1-19 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,985,905, issued to Prompt et al. (hereinafter referred to as "<u>Prompt</u>"). By this Amendment, claims 1-19 have been canceled without prejudice or disclaimer and claims 20-37 have been added.

It is submitted that the differences in wording between claims 1-19 and 20-37 is not sufficiently significant to prevent examination of claims 20-37. Independent claims 20, 26 and 32 recite limitations that can be found in slightly different form in the claims originally filed, while the dependent claims are fully supported by the specification. In addition, MPEP § 2171(III) states "[t]he second paragraph of 35 U.S.C. § 112 does not prohibit applicants from changing what they regard as their invention during the pendency of the application." Therefore, the Applicants respectfully traverse the Examiner's rejections with reference to the new claims.

Independent method claim 20 recites "displaying the personal connection map based on the secondary metadata retrieved" at line 10. The Office Action did not cite and nothing can be found in <u>Prompt</u> that discloses generating or displaying a personal connection map based on metadata extracted from information about persons and for which links have been formed

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based on co-occurring relationships of the information. Therefore, it is submitted that claim 20 and dependent claims 21-25, which depend therefrom, patentably distinguish over <u>Prompt</u>. The additional details of the personal connection map recited in the dependent claims provide additional distinctions over <u>Prompt</u>.

Independent claim 26 recites a computer-readable medium encoded with a program that causes a computer to perform similar operations to that recited in claim 20. Therefore, it is submitted that claim 26 and dependent claims 27-31, which depend therefrom and recite additional distinctions, patentably distinguish over Prompt for the reasons submitted above.

Independent apparatus claim 32 recites "a displaying unit that displays the personal connection map based on the secondary metadata retrieved" at lines 11-12. The Office Action did not cite and nothing can be found in <u>Prompt</u> that discloses a displaying unit that displays a personal connection map. Therefore, it is submitted that claim 32 and dependent claims 33-37, which depend therefrom and recite additional distinctions, patentably distinguish over <u>Prompt</u>.

## Summary

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date:

12/21/06

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